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April 14, 2020

By ECF/Email

Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
New York, New York 10007

Re: United States v. Jaime Morales Sanchez, 19 Cr. 688 (VSB)

Hon. Judge Broderick:

With the consent of the Government, I write to respectfully request that the Court advance sentencing in this case from its current date of May 1, 2020 to any date between Tuesday, April 21 and Friday, April 24, 2020.

Mr. Morales Sanchez has been incarcerated in connection with this case since September 12, 2019, first at the Metropolitan Correctional Center and now at the Westchester County Jail. On January 30, 2020, he pleaded guilty to making a false statement in a passport application in violation of 18 U.S.C. § 1542 and 2 pursuant to a plea agreement with a stipulated guidelines range of one to seven months' imprisonment. On March 3, 2020, in my presence, U.S. Probation Officer Angela Cosenza interviewed Mr. Morales Sanchez for a presentence report with the assistance of a Spanish interpreter. On April 6, 2020, the first draft of her report was circulated to counsel for both parties. By April 20, 2020, the parties will have had 14 days to state any objections to that report in writing. Mr. Morales Sanchez is prepared to waive his rights under Federal Rule of Criminal Procedure 32 with regard to the timing of disclosure for a final presentence report.

Given that a presentence report can be made available to the Court shortly and that Mr. Morales Sanchez has already served the top of his guidelines on this case, we request that sentencing be expedited from May 1, 2020 to next week. Mr. Morales Sanchez consents to proceeding to sentencing by phone. Mr. Morales Sanchez's sentencing memorandum is already due this Friday, April 17, 2020. Assistant U.S. Attorney Jarrod Schaeffer has agreed to submit his sentencing memorandum next Monday, April 20, 2020, instead of the original due date of April 24, 2020 in order to enable the Court to grant our request. Thank you for considering it.

Respectfully submitted,

/s/ Ariel Werner  
Ariel Werner  
Assistant Federal Defender  
(212) 417-8770

cc: Jarrod Schaeffer, Assistant U.S. Attorney